

EXHIBIT 3

**(NCGP Response to NCSBE Attorney Candace Marshall –
June 22, 2022)**

**Follow-Up Questions from State Board of Elections Associate General Counsel
Candace Marshall, with Answers in Bold from NCGP Officers**

Retained Petitioners:

- Please provide the full name, address, email, and phone number of the retained 28 petitioners that were trained and regular volunteers and of the retained 16 petitioners that were trained and given a stipend.

**We retained 28 people, in our estimation, as trained, regular volunteer petitioners.
They are as follows:**

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| Abir Chowdhry, [REDACTED] |
| Anna Ordoubadi, [REDACTED] |
| Anne Cassebaum, [REDACTED] |
| Anthony Pranger, [REDACTED] |
| Aviel Washington, [REDACTED] |
| Charlie Hammerle, [REDACTED] |
| Cole McMullin, [REDACTED] |
| Davion Washington, [REDACTED] |
| Emily Przykucki, [REDACTED] |
| Faith Orr, [REDACTED] |
| Gerald Werhan, [REDACTED] |
| Haley Kinsler, [REDACTED] |
| Haley Nelms, [REDACTED] |
| Hwa Huang, [REDACTED] |
| Jacob Samuels, [REDACTED] |
| Jacqueline Knable, [REDACTED] |
| Jan Martell, [REDACTED] |
| Jeanine Couto, [REDACTED] |
| LeAnne Bartelt, [REDACTED] |

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| Matthew Hoh, [REDACTED] |
| Matthew Skolar, [REDACTED] |
| Michael Martelli, [REDACTED] |
| Mike Nutt, [REDACTED] |
| Rohima Miah, [REDACTED] |
| Scott Satalino, [REDACTED] |
| Tommie James, [REDACTED] |
| Tyra Frye, [REDACTED] |
| Wayne Turner, 146 Robert Alston Jr, Pittsboro, NC 27312, (919) 491-3186, build4green@protonmail.com |

We retained 16 people, in our estimation, as regular, trained petitioners to whom NCGP or MH4S, or both, paid stipends. They are as follows:

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| Ahmed Selim, [REDACTED] |
| Brookie Mattingly, [REDACTED] |
| David Slesinger, [REDACTED] |
| Gayle Gorlewski, [REDACTED] |
| Gino Fernandes, [REDACTED] |
| Jacob Falzone, [REDACTED] |
| James Doonquah, [REDACTED] |
| Janie Ekere, [REDACTED] |
| Javier Madrigal, [REDACTED] |
| Matthew Richmond, [REDACTED] |
| Michael Trudeau, [REDACTED] |
| Nicholas DiDonna, [REDACTED] |
| Sadie Spence, [REDACTED] |
| Samantha Spence, [REDACTED] |
| Samantha Worrel, [REDACTED] |
| Tony Ndege, [REDACTED] |

To the best of our knowledge, no other individuals collected more than a negligible amount of signatures for our drive, with the exception of the firms' workers, who are mentioned below.

- Were First Choice and Evans Political Consulting Firm the only two businesses contracted with to obtain signatures?

Yes.

First Choice:

- Please provide a copy of your contract with First Choice.

The contract is available online: [First Choice and Mack Douglas Contract with NCGP and Matt Hoh for Senate 27 Jan 2022-214453.pdf](#)

- What were the dates of service or range of dates when names were collected?

The contract start date was January 27, 2022, with an estimated completion date of February 20. The goal, stated in the contract, was for the firm to deliver 2,000 signatures to NCGP by February 20. However, the first and only batch of First Choice signatures the NCGP received contained just 59 good signatures (where in this case “good” means complete, legible, and on the correct county sheet) and were delivered by First Choice on February 14, 2022, to NCGP officer Jan Martell in Durham. The rest of that batch contained 50 “bad” signatures, in that there was no county name written at the top of the sheet at all, and a cursory look showed that signers were from different parts of the state. We are unsure whether these 50 “bad” signatures were ultimately submitted to county boards. With only a few days remaining for the firm to deliver the 2,000 good signatures by our target date of February 20, and after much back-and-forth with First Choice over the ensuing days, it became apparent to us that the firm was not collecting the signatures it had agreed to, and so we ended the contract, as the firm had missed the February 20 deadline to deliver 2,000 and delivered only the one small usable batch on February 14.

- Further explain the circumstances as to why First Choice was not able to deliver any more signatures and termination of the contract.

As far as we can tell, First Choice had a more lucrative contract in Durham that seemed to consume its focus. We believe this in part due to the firm’s initial letter of inquiry by its principal to NCGP, in which that other priority is implied: [Initial email inquiry from Shawn Wilmoth of First Choice.pdf](#). Regardless, the fact that First Choice

was not regularly collecting signatures for us was in violation of our contract—as, per the contract, the firm was supposed to deliver signatures to us each week but wasn't. We do not know why First Choice was unable to deliver more signatures; but we can suppose that the firm was unable to find and train petitioners. We asked First Choice principal Shawn Wilmoth to return our fee after several weeks of their not delivering signatures, and he did refund both NCGP and MH4S the entirety of our fees. We had no faith that the firm would collect the agreed-upon signatures within the timeframes outlined in the contract or at a later point in the coming months, and the firm's lack of communication and lack of concern for our feedback (i.e., that roughly half the small batch of signatures the firm did collect were incorrectly done) did not encourage our further trust in the company.

- What alerted you that there may have been some irregularities with about half of the signatures that were collected by First Choice subcontractors?

To clarify, roughly half of the First Choice signatures were “irregular,” in our view, only in that the firm had collected signatures from voters in different counties on the same sheets, when signatures need to be collected per county—e.g., a voter registered in Durham needs to sign a sheet with “Durham County” written at the top. The firm’s error was immediately evident because the petitioner hadn’t written a county name at the top of five petition sheets at all, so we examined those signatures closer and found addresses from different parts of the state on the same sheet. The signatures First Choice delivered did not appear to be illegitimate apart from roughly half simply being collected on the wrong county sheet; we assume the errors were mistakes and nothing more. Collecting signatures from multiple counties on the same sheet is the main mistake that new circulators make, even, in our experience, when this is clearly communicated to them in training and in written and visual instructions. We made it clear to First Choice that they had to ask the person signing which county they are registered to vote in. Per our contract with First Choice, though, that training was the firm’s responsibility.

- Were petition pages and signatures verified through First Choice or the NC Green Party?

Per the contract, the signatures were supposed to be verified by First Choice and were to carry at least a 70% validity rate, but to our knowledge the firm did not attempt to verify them.

- What county were these petition pages submitted to?

We submitted the 59 good First Choice signatures, mentioned above, to the Durham County Board of Elections. We aren't sure if we submitted the remaining 50 signatures with no county written at the top of the sheet, but if we did they were likely submitted to Durham County as well.

- Please provide the full name, address, email and phone number of the subcontractors that were used from First Choice.

We do not have all of this information because our contract was with First Choice, to the best of our knowledge, not with its workers. Our contract does indicate a Mack Douglas LLC (~~1309 Coffeen Ave., Ste. 3329, Sheridan, WY 82801~~) as a party to the contract, with First Choice as the party with "financial Responsibility to this project and for payment of all contractors executing services rendered," but to our recollection we had no contact with a Mack Douglas of any kind or understanding of his role in the agreement, and initial drafts of the contract were even more unclear in this regard. We do have a name and a cell phone number of one of First Choice's petitioners, who we believe is the person who delivered the sole batch of signatures to Martell on February 14: James Connor, ~~(248) 499-2521~~.

- Did you ever have direct contact with subcontractors from First Choice?

We did not meet any First Choice employee or subcontractor in person, with the exception of the single dropoff of signatures—by Connor, we believe—at Martell's house on February 14, but the meeting was very brief. NCGP officer Wayne Turner called Connor multiple times and spoke with him once or twice. Turner called him because the firm was not delivering signatures as required in the contract, and we were seeking answers. To the best of our recollection, Connor responded to Turner that we should direct our questions to Wilmoth.

Evans Political Consulting Firm:

- Please provide a copy of the contract with Evans Political consulting firm.

The contract is available online: [Lee Evans Petitioning Contract.pdf](#)

- Please provide the full name, address, email and phone number of the subcontractors used.

We don't know with certainty how many subcontractors Evans (or First Choice, for that matter) used. It was the firms' responsibility to hire the subcontractors. In fact, initially we did not know what relationships the firms had with their petitioners—i.e., whether their petitioners were experienced employees of the firms or experienced subcontractors or even inexperienced ones. We can give three names and contact information for three Evans Consulting subcontractors we know of, and we know of them because Evans recommended that we contract with the three directly because they were, to our knowledge, the only regular petitioners Evans had been able to retain. In turn, MH4S did briefly contract with the three petitioners, from May 11 to the afternoon of May 17. They are:

- LaCourtney "A.C.E." Griffin, 9211 Calabria Dr, #102, Raleigh, NC 27617, 252-314-0227
- Joshua Mullins, 9211 Calabria Dr, #102, Raleigh, NC 27617, 252-822-3626
- John Williams, 3306 Parable Way, Cary NC 27519, 919-724-1010

- Please provide the county and location of where they collected signatures.

The primary counties were Wake and Durham, but we do know that Griffin and Mullins wrote their names or initials on all of their petition sheets—either "A.C.E." for Griffin or "Josh M." or the like for Mullins.

- Was there any type of review or verification process on the petition pages before being submitted to the county?

We submitted over 22,000 signatures to the county boards. We would review signatures when time permitted for missing and illegible information, but time rarely did permit it, and no one was being paid for such work, and to our knowledge state statute does not require us to research every name and signature. Typically the process was that NCGP secretary Michael Trudeau would tally up the Evans firm's good signatures (where "good" means complete and legible information) in the evenings and communicate the numbers to Evans. Trudeau was told by Mullins and Griffin that they were professional canvassers, and he assumed their good faith.

- Please provide the contract with the subcontractors that Evans Political Consulting suggested that you continue to use after your initial contract was canceled.

To be clear, MH4S contracted individually with the three former Evans subcontractors, not as a group of individuals, so there are three separate contracts. The contracts are available online:

- **LaCourtney Griffin contract, [Matthew Hoh for Senate Petitioner contract - LaCourtney Griffin copy.pdf](#)**
- **Joshua Mullins contract, [Matthew Hoh for Senate Petitioner contract -- Joshua Mullins copy.pdf](#)**
- **John Williams contract, [Matthew Hoh for Senate Petitioner contract -- John Williams copy.pdf](#)**

● Did you have direct contact with these subcontractors?

Yes. The petitioners would typically drop off signatures at NCGP secretary Michael Trudeau's house in Cary. One of them (Williams) would do so in the afternoons by himself, and two of them (Griffin and Mullins) would do so together. The process was that Trudeau would count up their good signatures (where "good" means complete and legible information) that evening and communicate the numbers to Evans Consulting. On May 17, the petitioners also met with Trudeau and NCGP cochair Jan Martell in the afternoon at two different county boards of election (Wake and Durham) to hand in their latest signatures directly to the boards they had presumably collected that day on Primary Day. Williams and Griffin met Martell at the Durham Board separately at different times that day, and Mullins met Trudeau at the Wake board.

Training:

● Did subcontractors from First Choice and Evans Political Consulting also participate in the training and zoom sessions conducted by the NC Green Party?

No. Our understanding was that it was the firms' responsibility to train its petitioners.